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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$25,000.00 IN
U.S. CURRENCY,

15 Defendant.
16

CASE NO. 1:22-MC-00035-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jesus
18 Pedro Maldonado Ceja (“claimant”), by and through their respective counsel, as follows:

19 1. On or about December 1, 2021, claimant Maldonado Ceja filed a claim in the
20 administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the
21 Approximately \$25,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on
22 September 2, 2021.

23 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the
26 claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture
27 proceeding.

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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was March 1, 2022.

6 4. By Stipulation and Order filed March 4, 2022, the parties stipulated to extend to May 2,
7 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
9 forfeiture.

10 5. By Stipulation and Order filed April 26, 2022, the parties stipulated to extend to July 31,
11 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant property and/or to obtain an indictment alleging that the defendant property is subject to
13 forfeiture.

14 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
15 to September 29, 2022, the time in which the United States is required to file a civil complaint for
16 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
17 currency is subject to forfeiture.

18 7. Accordingly, the parties agree that the deadline by which the United States shall be
19 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
20 alleging that the defendant currency is subject to forfeiture shall be extended to September 29, 2022.

21 Dated: July 29, 2022

PHILLIP A. TALBERT
United States Attorney

22
23 /s/ Kevin C. Khasigian
24 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

25
26 Dated: July 28, 2022

27 /s/ Robert L. Forkner
28 ROBERT L. FORKNER
Attorney for potential claimant
Jesus Pedro Maldonado Ceja
(As approved by email on 7/28/22)

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2 IT IS SO ORDERED.

3 Dated: **July 29, 2022**


UNITED STATES DISTRICT JUDGE